

## **EXHIBIT 8**

Joseph Michael Phillips 3/22/2023

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

JOSEPH MICHAEL PHILLIPS	)	
	)	CIVIL ACTION NUMBER
Plaintiff,	)	
	)	
v.	)	4:22-cv-184
	)	
COLLIN COMMUNITY COLLEGE	)	
DISTRICT, et al.,	)	
	)	
Defendants.	)	

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ORAL DEPOSITION OF

JOSEPH MICHAEL PHILLIPS

MARCH 22, 2023

VOLUME 1 OF 1

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ORAL DEPOSITION OF JOSEPH MICHAEL PHILLIPS, produced as a witness duly sworn by me at the instance of the Plaintiff, was taken in the above styled and numbered cause on MARCH 22, 2023, from 9:18 AM to 12:42 PM, before Beth Howard, CSR in and for the State of Texas, reported by Machine Shorthand, at Pacific Place, located at 1910 Pacific Avenue, 14th Floor, Conference Room 2, Dallas, Texas, pursuant to the Federal Rules of Civil Procedure, Notice of Deposition, and the provisions stated on the record or attached hereto.

Stormy Jackson Reporting  
stormyrpr@outlook.com

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1 (OATH ADMINISTERED BY THE REPORTER.)

2 JOSEPH MICHAEL PHILLIPS,

3 having been first duly sworn, testified as follows:

4 EXAMINATION

5 BY MR. CRAWFORD:

6 Q. Good morning.

7 A. Good morning.

8 Q. Would you please state your name for the  
9 record?

10 A. Joseph Michael Phillips.

11 Q. Dr. Phillips, we are here today to take your  
12 deposition.

13 And I want to make sure the one agreement  
14 that you and I have as we go forward is that you  
15 understand my questions --

16 A. Um-hmm.

17 Q. -- because if you don't understand my  
18 questions, you're not able to give your best answers,  
19 and that's what we're looking for.

20 So if at any time you don't understand my  
21 question or it's confusing or doesn't make sense to you,  
22 please let me know, and we'll work through it and -- to  
23 make sure that you understand what I'm asking, and then  
24 I'll understand what you're answering.

25 A. Okay. Absolutely.

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1 nonresponsive.

2 Q. (BY MR. CRAWFORD) My question was: When you  
3 signed this contract, did you say, "I don't understand  
4 what 'core values' means because it's vague. Would you  
5 please explain it to me?"

6 MR. GREUBEL: Objection, form.

7 A. I would say this: I read it. I had my -- my  
8 understanding of the core values, and I have complied  
9 with them.

10 Q. (BY MR. CRAWFORD) What is your understanding of  
11 the core values?

12 A. Which one?

13 Q. You said that you had your understanding of the  
14 core values, so I was asking what your understanding  
15 was.

16 A. So, essentially, that you -- you do your duties  
17 in the classroom, that you behave with dignity towards  
18 the students, you are respectful to people, and that  
19 includes, you know, having honest, frank dialogue.  
20 That's what I interpreted that as meaning, that you're  
21 open with people. You know, that -- I can't remember  
22 all of the items. But, I mean, I remember the dignity  
23 and respect thing, because it gets repeated a lot at the  
24 college.

25 Q. Paragraph 6 provides that the "contract does

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1 Q. How did you -- why did you cite The FIRE.org,  
2 then, in your post?

3 A. Well, as you see, I posted the story. They had  
4 it on their website.

5 Q. Had you heard of FIRE.org before --

6 A. Yes.

7 Q. -- seeing this?

8 A. I'm sorry. Yeah.

9 Q. Give me some context of that.

10 A. Lora Burnett was represented by them, and so I  
11 was friends with Lora Burnett. She had been illegally  
12 fired. And she was represented by TheFIRE.org, and she  
13 got a settlement. So I was aware of them because of  
14 that.

15 Prior to Lora Burnett being represented, I  
16 had never heard of the group.

17 Q. Okay. And were you aware of FIRE.org through  
18 Dr. Burnett before you made this post?

19 A. Yeah.

20 Q. Okay. Turning to Page 339, the top post says,  
21 "Perhaps some local colleges should take a similar step  
22 and show some courage, integrity, and treat their  
23 community with dignity and respect."

24 Is that your post?

25 A. Yes.

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1 A. Yes.

2 Q. The word "dignity" to you is vague?

3 A. Yeah.

4 Q. And the word "respect" is vague?

5 A. Yeah.

6 Q. Okay. You don't know what those two words  
7 mean?

8 A. I know what they mean, but, I mean, those are  
9 broad terms. And it's unclear what they mean, because  
10 they seem to say that if I speak publicly on a matter of  
11 public concern, that's violating dignity and respect,  
12 and that's not within my definition.

13 Q. So you don't have a definition of "dignity"?

14 A. Yeah, yeah, that you -- that you behave in a  
15 way that communicates that you're aware of the rights of  
16 other people. That you -- you're not vulgar. You're  
17 not -- you aren't personal in your attacks. That you're  
18 not -- you know, that you're -- you are tolerant of  
19 other people, and you -- you try to be aware of them.

20 So, yeah, I have that definition, but I  
21 don't -- I didn't violate that

22 MR. DAVIS: And I'll object to that last  
23 phrase -- or that last part as being nonresponsive.

24 Q. (BY MR. DAVIS) The same with "respect." You  
25 understand what that word means, don't you, sir?



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Plaintiff,	)	
	)	
v.	)	4:22-cv-184
	)	
COLLIN COMMUNITY COLLEGE	)	
DISTRICT, et al.,	)	
	)	
Defendants.	)	

REPORTER'S CERTIFICATION OF  
ORAL DEPOSITION OF JOSEPH MICHAEL PHILLIPS  
MARCH 22, 2023

I, BETH HOWARD, a Certified Shorthand Reporter  
in and for the State of Texas, hereby certify to the  
following:

That the witness, JOSEPH MICHAEL PHILLIPS, was duly  
sworn and that the transcript of the oral deposition is  
a true record of the testimony given by the witness;

That pursuant to information given to the deposition  
officer at the time said testimony was taken, the  
following includes all parties of record and the amount  
of time used by each party at the time of the  
deposition:

GREG GREUBEL, ESQ. (00 hours, 00 minutes)  
Attorney for Plaintiff  
CHARLES J. CRAWFORD, ESQ. (02 hours, 52 minutes)  
Attorney for Non-Board of Trustee Defendants  
ROBERT J. DAVIS, ESQ. (00 hours, 14 minutes)  
Attorney for Defendant Board of Trustees

Joseph Michael Phillips 3/22/2023

1 I further certify that I am neither counsel for,  
2 related to, nor employed by any of the parties or  
3 attorneys in the action in which this proceeding was  
4 taken, and further that I am not financially or  
5 otherwise interested in the outcome of the action.

6 Certified to by me on this 31st day of March, 2023.

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BETH HOWARD, TEXAS CSR 529  
EXPIRATION DATE: 4/30/2025  
Stormy Jackson Reporting  
Firm Registration #610  
1518 Clear Creek Drive  
Allen, Texas 75002  
214.491.0117

Stormy Jackson Reporting  
stormyrpr@outlook.com



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## 1 REPORTING FIRM FURTHER CERTIFICATION

2 That the deposition transcript was duly submitted on  
3 April 3rd, 2023, to Greg Greubel, Esq. for examination,  
4 signature and return to Stormy Jackson Reporting by  
5 May 6th, 2023;

6 That I am neither counsel for, related to, nor  
7 employed by any of the parties or attorneys in the  
8 action in which this proceeding was taken, and further  
9 that I am not financially or otherwise interested in the  
10 outcome of the action.

11 Certified to by me on this 3rd day of  
12 April, 2023.

13  
14  
15 \_/s/ Stormy Jackson\_\_\_\_\_  
16 STORMY JACKSON REPORTING  
17 Firm Registration #610  
18 1518 Clear Creek Drive  
19 Allen, Texas 75002  
20 214.491.0117  
21  
22  
23  
24  
25

19 Taxable cost of deposition transcript: \$1,558.50  
20 Charged to Mr. Charles Crawford, Attorney for Defendants,  
21 Collin Community College District, et al.

Stormy Jackson Reporting  
stormyrpr@outlook.com